

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 2:06-cr-0169-WHA
)	
JAMES CALVIN TALLEY,)	
)	
Defendant.)	

MOTION TO EXTEND PRETRIAL MOTIONS' DEADLINE

COMES NOW, the defendant, James Calvin Talley, by and through the undersigned attorney, Richard K. Keith, and moves this Honorable Court to extend the deadline for filing pretrial motions.

As grounds in support thereof, the following is stated:

1. The deadline for filing pretrial motions is currently March 29, 2007.
2. Trial in this matter is set on the June 4, 2007 Trial Term.
3. The discovery in this sixteen (16) defendant case is voluminous and will require additional time to review it in its entirety prior to preparing any pretrial motions, particularly as the defendant is incarcerated.
4. Assistant United States Attorney A. Clark Morris has no objection to continuing the pretrial motions deadline in this matter.

WHEREFORE, premises considered, the moves this Honorable Court to extend the deadline for filing pretrial motions in this matter.

Respectfully submitted this 19th day of March, 2007.

s/ Richard K. Keith
RICHARD K. KEITH (KEI003)
Attorney for Defendant
KEITH & DUBIN, P.C.
22 Scott Street
Montgomery, AL 36104-4012
Telephone: (334) 264-6776
Facsimile: (334) 265-5362

CERTIFICATE OF SERVICE

I hereby certify that on March 19, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

A. Clark Morris, AUSA
United States Attorney's Office
Post Office Box 197
Montgomery, AL 36101-0197

s/ Richard K. Keith
OF COUNSEL